REMARKS/ARGUMENTS

I. Status of Claims

Prior to this amendment, claims 1-21 are pending of which claims 1, 6 and 11 are independent. By this amendment, claims 1, 2, 6, 7 and 10 have been amended, and claims 11-21 have been canceled without prejudice and disclaimer to the subject matter recited therein.

II. Rejection under 35 U.S.C. § 102

Claim 11 is rejected under 35 U.S.C. §102 (a) as being anticipated by Korean Publication No. 2001019998 to Lee.

The rejection is moot now that claim 11 has been canceled. Accordingly, the Examiner is kindly requested to withdraw the rejection.

III. Rejection under 35 U.S.C. § 103

Claims 1 and 6

Claims 1 and 6 are rejected under 35 U.S.C. §103(a) as being unpatentable over Korean Publication No. 2002058347 to Ahn in view of Lee, further in view of U.S. Publication No. 2003/0139141, to Marjamake, and further in view of U.S. Patent No. 5,630,116 to Takaya. Applicant respectfully traverses the rejection.

Claim 1, as amended, recites a method for updating identifier (ID) information of a Node-B, and resetting a UMTS radio manager (URM) system using the updated ID information of the Node-B in the URM system which manages the Node-B and a predetermined number of radio network controllers (RNCs) each associated with a source RNC. The method comprises:

> a) using the URM system to create a processor loading data
> (PLD) of the Node-B that can be changed, and transmitting the

created PLD <u>in a form of an extension specification file (ESF)</u> to the Node-B and the RNCs each of which is associated with the source RNC requiring the created PLD;

b) operating the Node-B and the RNCs having received the created PLD to update a previously stored old PLD according to the received PLD; and

c) resetting the Node-B and the RNCs upon receipt of the updated PLD;

<u>wherein the ESF stores data to be updated in relation to received hardware format information and data associated with the data that is different between the old PLD and the updated PLD.</u> (emphasis added).

Ahn discloses a method for transmitting the PLD for a new base station to a BSC through a BSM, in the case of additionally installing the base station, in order to set up the PLD without initializing the BSC. In detail, Ahn discloses the following. Initial PLDs are constructed in a BSM. If an operator inputs an additional base station installation command to the BSM, the BSM manufactures the PLD for the new base station. Then the BSM confirms whether a BSC to manage the new base station is installed. If it is confirmed that the new base station is not installed, the BSM transmits the PLD to the base station. Receiving the PLD, the BSC updates a database storing a PLD for each base station. The BSM adds, modifies or stores a PLD table for each base station. That is, Ahn teaches that it is available to transmit a PLD for a new base station without interrupting service as a result of initializing the BSC.

As can be seen, Ahn's disclosure is only for additionally installing the base station, and thus it does not disclose <u>transmitting the created PLD in a form of an extension specification file (ESF) to the Node-B and the RNCs</u> and <u>operating the Node-B and the RNCs having received the created PLD to update a previously stored old PLD according to the received PLD</u>, as recited in Applicant's claim 1. In particular, Ahn also fails to disclose, teach, or suggest the subject matter of an ESF <u>wherein the ESF stores data to be updated in relation to received hardware format</u>

information and data associated with the data that is different between the old PLD and the updated PLD.

Admitting that Ahn fails to disclose the subject matter of operating the Node-B and the RNCs having received the created PLD and updating only the differing parts between the pre-stored PLD and the received PLD, the Examiner nonetheless turns to Lee as disclosing this subject matter. Lee, however, fails to teach an ESF wherein the ESF stores data to be updated in relation to received hardware format information and data associated with the data that is different between the old PLD and the updated PLD, as recited in claim 1. The Examiner relies on the template PLD of Lee as disclosing the ESF as claimed. See page 3 and the middle of page 9 of the Office Action. In particular, the Examiner appears to characterize the template PLD of Lee as containing modified data in the template PLD and only updating modified data in the template PLD. Applicant respectfully disagrees with the Examiner's characterization.

The template PLD, as disclosed in Lee, is merely for storing the existing PLD (pre-created PLD), as opposed to storing the new PLD. This is hardly surprising, since "template", as understood by a person of ordinary skill in the art", is a **pattern** used to create new documents, and does not import the meaning of storing "difference" information. Hence, an ordinary skilled in the art will not construe a "template" PLD as storing data associated with the data that is **different between the old PLD and the updated PLD**, as recited in claim 1.

In addition, with respect to "modified data", as shown in the machine-translated version of Lee provided by the Examiner, contrary to the Examiner's characterization, it appears that the "modified data" refers to data inputted using MMC (man-machine-command) order to generate a new PLD, and thus does not refer to contents contained in the template PLD. See paragraphs 1, 7 and 8 under the section titled "The Structure and Function of the Invention", and claim 1 of the machine-translated version of Lee. Hence, even with reference to the relevant descriptions in

the machine-translated version of Lee, the "modified data" is not disclosed as something contained in the template PLD.

Further, nowhere does Lee teach a template PLD storing data to be updated in relation to received hardware format information, as now recited in claim 1 with respect to the ESF. Specifically, nowhere does Lee disclose receiving hardware format information and creating data to be updated in relation to the received hardware format information.

Accordingly, Lee does not cure Ahn's deficiency with respect to an ESF wherein the ESF stores data to be updated in relation to received hardware format information and data associated with the data that is different between the old PLD and the updated PLD, as recited in claim 1. Accordingly, claim 1 should be allowable over Ahn and Lee, and the withdrawal of the rejection of claim 1 is therefore respectfully requested.

Claim 6 contains the same recitation as claim 1 with respect to the ESF. Accordingly, claim 6 is also believed to be allowable over Ahn and Lee, and the rejection of claim 6 should therefore be withdrawn.

Claims 2-5, 7-10

Claims 2-4 and 7-9 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ahn in view of Lee, Marjamake and Takaya, and further in view of U.S. Publication No. 2006/0234706 to Wallentin. Further, claims 5 and 10 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ahn in view of Lee, Marjamaki, Takaya and Wallentin as applied to claims 3, 4, 8 and 9 above and further in view of Korean Publication No. 2001045784 to Kim. Applicant respectfully traverses the rejections.

Claims 2-5 and 7-10 depends from independent claims 1 and 6, and thus inherit all the limitations of the independent claims. The secondary references Marjamake, Takaya, Wallentin and Kim are cited for allegedly disclosing secondary features recited in claims 2-5 and 7-10. These references have not been proven to cure the deficiencies of Ahn and Lee discussed above in connection with claims 1 and 6. Accordingly, Applicant need not further discuss these secondary references in relation to the patentability of claims 2-5 and 7-10, and these claims should be allowable over Ahn, Lee and these cited secondary references. The withdrawal of the rejections of claims 2-5 and 7-10 is therefore respectfully requested.

Claims 12-21

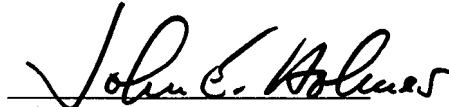Claims 12-21 are rejected under 35 U.S.C. §103(a) over Lee in view of secondary references.

The rejection is now moot now that claims 12-21 have been canceled. Accordingly, the Examiner is kindly requested to withdraw the rejection.

IV. Conclusion

In view of the above, it is believed that this application is in condition for allowance and notice to this effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the telephone number indicated below.

Should **any/additional** fees be required, the Director is hereby authorized to charge the fees to Deposit Account No. 18-2220.

Respectfully submitted,

John E. Holmes
Attorney for Applicant
Reg. No. 29,392

Roylance, Abrams, Berdo & Goodman, L.L.P.
1300 19th Street, N.W., Suite 600
Washington, D.C. 20036
(202) 659-9076

Dated: _Nov. 9_ , 2007